## IN THE UNITED STATES COURT FOR THE WESTERN DISTRICT OF TEXAS AUSTIN DIVISION

TEXAS TRIBUNE, MANO AMIGA, and CALDWELL/HAYS EXAMINER, **§** § § § § § Plaintiffs. v. CALDWELL COUNTY, TEXAS, TREY Civil Action No. 1:23-cv-910 HICKS, in his official capacity as Caldwell § County Court at Law Judge and Caldwell County Magistrate, § § § MATT KIELY, SHANNA CONLEY, ANITA DELEON, and YVETTE MIRELES, in their official capacities as Caldwell County Justices of the Peace and Caldwell County Magistrates, and MIKE LANE, in his official capacity as the Sheriff of Caldwell County, Defendants.

## **JOINT MOTION TO EXTEND STAY**

In accordance with the Docket Text Order dated May 5, 2025, Plaintiffs Texas Tribune, Mano Amiga and Caldwell/Hays Examiner and Defendants Caldwell County, Texas, the Honorable Trey Hicks, in his official capacity as Caldwell County Court at Law Judge and Caldwell County Magistrate, the Honorable Matty Kiely, the Honorable Shanna Conley, the Honorable Anita DeLeon, and the Honorable Yvette Mireles, in their official capacities as Caldwell County Justices of the Peace and Caldwell County Magistrates, and the Honorable Mike Lane, in his official capacity as the Sheriff of Caldwell County, (hereinafter "Parties") file this joint motion to extend the stay.

The Parties continue to work to finalize details of a possible resolution of this matter.

Counsel for Defendants presented Plaintiffs' proposed consent decree to the Caldwell County

Page 2 of 3

Commissioners Court on May 27. Following that presentation, counsel for Defendants anticipates exchanging a counterproposal with counsel for Plaintiffs in the coming week and engaging in further discussions with the Caldwell County Commissioners Court at its June 10 meeting. The Parties respectfully request that the Court permit the Parties to continue necessary discussions between undersigned counsel and their respective clients.

WHEREFORE, the Parties respectfully request that the Court permit them to continue settlement negotiations and file either dismissal papers or an agreed motion to extend the stay on or before July 15, 2025.

DATED: May 30, 2025

## /s/ Camilla Hsu

Camilla Hsu
State Bar No. 24130207
Deason Criminal Justice Reform Center
SMU Dedman School of Law
P.O Box 750116 | Dallas, TX 75275
(214) 768-6974
camillah@smu.edu
Counsel for Plaintiffs Mano Amiga and Caldwell/Hays Examiner

## /s/ Scott Wilkens

Scott Wilkens, Pro Hac Vice Knight First Amendment Institute at Columbia University 475 Riverside Drive, Suite 302 New York, NY 10115 (646) 745-8500 scott.wilkens@knightcolumbia.org Counsel for Plaintiffs /s/ J. Eric Magee

J. Eric Magee SBN: 24007585

e.magee@allison-bass.com Susana Naranjo-Padron

SBN: 24105688

s.naranjo-padron@allison-bass.com ALLISON, BASS & MAGEE, L.L.P. 1301 Nueces Street, Suite 201 Austin, Texas 78701 (512) 482-0701 telephone Counsel for Defendants